

NEW YORK
LONDON
SINGAPORE
PHILADELPHIA
CHICAGO
WASHINGTON, DC
SAN FRANCISCO
SILICON VALLEY
SAN DIEGO
LOS ANGELES
TAIWAN
BOSTON
HOUSTON
AUSTIN
HANOI
HO CHI MINH CITY

DuaneMorris®

FIRM and AFFILIATE OFFICES

BRIAN D. SIFF
DIRECT DIAL: +1 212 692 1055
PERSONAL FAX: +1 212 208 2430
E-MAIL: bdsiff@duanemorris.com

www.duanemorris.com

SHANGHAI
ATLANTA
BALTIMORE
WILMINGTON
MIAMI
BOCA RATON
PITTSBURGH
NEWARK
LAS VEGAS
CHERRY HILL
LAKE TAHOE
MYANMAR
OMAN
*A GCC REPRESENTATIVE OFFICE
OF DUANE MORRIS*

ALLIANCES IN MEXICO
AND SRI LANKA

September 18, 2019

BY ECF

Hon. Magistrate Judge Ramon E. Reyes, Jr.
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, New York 11201

Re: *Shandong Shinho Food Industries Co., Ltd. v. May Flower Int'l, Inc.*
(Civil Action No.: 1:19-CV-01621-MKB-RER)

Dear Magistrate Judge Reyes:

We represent the plaintiff, Shandong Shinho Food Industries Co., Ltd. ("Plaintiff"), in the above-captioned action. Pursuant to Your Honor's Orders dated August 5, 2019 and August 15, 2019, we submit this letter on behalf of the parties, Plaintiff and defendant, May Flower International, Inc. ("Defendant") to respectfully request an adjournment of the mediation, which is currently scheduled for September 26, 2019 until October 23, 2019. The parties also respectfully request Your Honor to extend the deadlines associated with the mediation, namely the deadlines for the parties to submit (a) their respective mediation statements to the mediator assigned to this case, Kenneth Plevan, from the current deadline of September 12, 2019 to October 9, 2019; and (b) their Mediation Report to Your Honor from the current deadline of October 10, 2019 until November 6, 2019. Finally, pursuant to Your Honor's order dated July 12, 2019, the parties respectfully request Your Honor to further stay the case pending the outcome of the mediation.

This is the parties' first requested adjournment with respect to the mediation. The requested adjournment is not being sought for the purpose of delaying the mediation. Plaintiff's in-house business representatives will travel to New York from Asia in order to attend the mediation in-person. The parties are requesting the adjournment to allow Plaintiff's

DUANE MORRIS LLP

1540 BROADWAY NEW YORK, NY 10036-4086

PHONE: +1 212 692 1000 FAX: +1 212 692 1020

Magistrate Judge Ramon E. Reyes, Jr.
September 18, 2019
Page 2

Duane Morris

representatives to obtain the necessary travel visas, and to accommodate the travel schedules of the in-house business representatives who will attend the mediation on behalf of the Plaintiff. Prior to submitting this letter to Your Honor, the parties contacted the mediator assigned to this case, Kenneth Plevan, to notify him that the parties would request an adjournment of the mediation and to confirm that Mr. Plevan is available to reschedule the mediation for October 23, 2019. Mr. Plevan confirmed that he agrees to reschedule the mediation for October 23, 2019.

We thank you for your consideration of this request.

Respectfully submitted,

/s/ Brian D. Siff

Brian D. Siff

GPG:slj

cc: All counsel of record (via ECF)
Kenneth Plevan (via e-mail Kenneth.Plevan @skadden.com; kenplevan@gmx.com)

DM2\10495325.1